

Roseanna Cunningham MSP
Cabinet Secretary for the Environment, Climate Change and Land Reform
St Andrew's House
Edinburgh



Scottish Environment LINK
13 Marshall Place
Perth
PH2 8AH

T 01738 630804
E enquiries@scotlink.org
W www.scotlink.org

12 June 2018

Dear Cabinet Secretary,

As agreed in our meeting in May, we have put together a more detailed overview capturing LINK member concerns regarding the current and future state of funding for biodiversity conservation in Scotland. The list below is provided in order to bring greater clarity to the nature of our specific concerns. We do appreciate that there are not necessarily easy answers in each case.

We believe that there is a case for maintaining and if possible increasing funds, on the basis of the multiple benefits that biodiversity provides but also by looking at a variety of policy mechanisms that would allow us to focus resources and prioritise actions. LINK members believe that the roll-out of a National Ecological Network would be helpful in this respect. We hope the below overview provides an opportunity for initiating a strategic discussion with you and your team on funding for biodiversity conservation in Scotland to identify both the pressures as well as potential solutions.

The backdrop to this, and primary indication that the current situation is problematic, is the most recent [SNH assessment](#) that Scotland's performance against Aichi target 20 - the biodiversity funding target - is moving away from target. We are grateful for SNH's honest assessment on this target and efforts to produce the Aichi report. We also understand that the concerns below might be to some extent familiar to you - for example recalling the letter on this subject from three LINK members sent on 15 December 2017.

We are therefore grateful for this invitation to highlight some of the specific instances where we perceive, or we have been told, that SNH and/or other agencies and NDPBs have insufficient resources to undertake actions that we see as important, sometimes imperative, elements of our collective effort for biodiversity conservation in Scotland. We perceive a lack of resources as by far the most significant reason that agencies and NDPBs are unable to tackle these biodiversity issues. This is leading to increasing reliance across the sector on, and competition for, other funding sources, in particular the HLF which is increasingly over-subscribed and itself facing reduced budgets due to falling lottery revenue (40% lower grant making budget in 18-19 cf. 17-18). As revealed by a recent [report](#) by the Environmental Funders Network, Scotland already stands at a considerable disadvantage compared to England and Wales when it comes to attracting funding for biodiversity: from 2012 to 2015, private foundation funding for environmental causes in England and Wales amounted to 20 times as much as that available in Scotland. Combined with the forthcoming loss of EU funding sources and shift in focus at SNH towards people-centered initiatives as reflected in SNH's Corporate Plan for 2018-2022, widespread concern is generated in our sector regarding the future of biodiversity in Scotland.

Below we provide an overview of LINK member concerns:

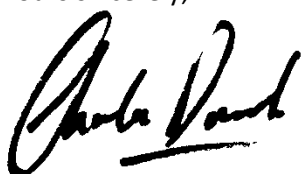
- **Land Management Support:** Funding for environmental outcomes via land-management support payments. Agri-environment funding stands at around 14% of the overall budget for rural support. This is the single most important mechanism for funding management in the wider land environment for environmental benefits and biodiversity. We feel the proportion of spend does not reflect the importance of this role, and we are concerned at the lack of clarity on the future course of environmental support payments.
- **National Nature Reserves:** Low levels of funding and staffing for the management of NNRs, particularly with regard to conservation management (rather than visitor provision). SNH staff have indicated that decline of public funding is a key challenge in the management of Scotland's NNRs. This is a common theme in discussions between area-based SNH staff and LINK members. For example, SNH staff reductions for the management of INNS at Loch Lomond NNR risk a reversal of progress made in recent years and the re-invasion of key habitats. We are told that SNH and FCS are considering alternative funding options for NNR management too. This increases the risk of competition with funding channels against charitable organisations.
- **NGO grants:** A reduction in SNH funding support for NGO delivery of shared conservation objectives. SNH funding has reduced and shifted from Framework payments awarded to larger organisations, which in recent decades underpinned this delivery partnership, towards a competitive Challenge Fund, focused only on a few themes – not all focused on conservation outcomes. We would question the efficiency (in terms of sectoral staff time) of opening up such relatively small budgets to a competitive scheme. In addition, a shift from unrestricted to restricted funding could further reduce NGOs' ability to raise funds from other sources, thereby being a potential "double hit". Indeed, smaller environmental charities have struggled to deliver on biodiversity projects with restricted grants and the increased competition could lead to them not being able to work in Scotland. This would be particularly damaging as many of the priority actions identified in the Scottish Biodiversity Route Map rely on NGO delivery.
- **Protected Areas:** We have clear indications from SNH that Site Condition Monitoring will be discontinued in March 2019 and replaced with a different monitoring model – and that the driver for that is the organisation being unable to afford to continue as at present. SNH were unable to assess certain important features in the current cycle, reportedly due to the costs involved. SNH supported having the National Performance Framework Protected Areas Indicator removed, on the grounds of Site Condition monitoring being too expensive within current budgets.
- **Priority Marine Features:** In preparing advice for the review of protection for Priority Marine Features in Scottish Waters SNH identified 'management areas' and 'knowledge gap areas' (that include historical records). Knowledge gaps include sensitivities of PMFs to various pressures, and the locations of key pinch-points for those pressures around our coasts. In a recent Marine Scotland Workshop on PMF measures, SNH were explicit that there are, however, no plans for work to identify those.
- **Science and monitoring:** We have multiple indications, from a variety of agency sources, that the capacity in Scotland for basic research to underpin biodiversity conservation is dwindling. These include: multi-year delays to completion of a national seabird census, caused by lack of funding for survey itself, and for its administration by JNCC; lack of funding to bolster and maintain coverage and standards of Seabird Monitoring Programme; a reduction in biodiversity science

posts at the James Hutton Institute; no funding in sight for continuing the programme of Countryside Surveys; loss of biodiversity/ecologist posts in local authorities; cuts in funding to CEH; the progressive decline in statutory funding for the SCARABBS national bird survey programme. With respect to the ecological monitoring of MPA network, while there is a monitoring strategy that prioritises where monitoring work should occur, there is no coherent/consistent monitoring plan or report.

- **Project Co-funding:** there are numerous instances where project development work on shared priorities, often led by eNGOs, has failed due to budget restrictions on agencies and NDPBs and lack of ability to co-finance against external funding. These include: an inability to commit requested co-finance, or to more than 1 year of co-funding, for the LIFE/HLF Atlantic Woodland proposal in 2016; withdrawal of proposals for a Uist Hedgehog LIFE project; an inability at SNH to co-fund a phase 2 of the successful LIFE Machair project. The latter has resulted in greylag goose schemes protecting HNV crop systems on the Uists being under-resourced, putting additional stresses on crofting systems that are critical for biodiversity.
- **Casework:** Due to reduced staff capacity, SNH now primarily engage on damaging casework where an impact of national significance is likely. Regionally or locally significant impacts now lack scrutiny, with local planning authorities determining outcomes themselves without SNH advice. In practice, no comment from SNH is often taken as an indication that a development is automatically benign for biodiversity.
- Finally, in the interests of taking a holistic view of how resources are used for biodiversity, we believe that there is often a **disconnect between high-level policy commitments, including the Aichi Targets, and the resourcing of their implementation**. For example, alignment does not always exist between the resourcing of biodiversity conservation through SNH's activities and oversight of biodiversity actions connected with the Biodiversity Duty. Whilst this disconnect may not always be measurable in cash terms, we believe that resources are sometimes being used inefficiently, which ultimately has serious financial consequences for biodiversity conservation more broadly.

We hope the above illustrates the depth of our shared concerns at this important juncture, and we look forward to further discussion and collective efforts to address these issues.

Yours sincerely,



Charles Dundas
Scottish Environment LINK Chair